

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NORTH DAKOTA

UNITED STATES OF AMERICA

v.

SANG BAE CHUNG, d/b/a DE NICE  
WEAR, INC.

**UNITED STATES' MOTION TO  
UNSEAL COMPLAINT AND  
WARRANT**

1:20-mj-00506-2

The United States of America, by Drew H. Wrigley, United States Attorney for the District of North Dakota, and Jonathan J. O'Konek, Assistant United States Attorney, moves this Court to unseal the Complaint and Warrant in this case as to only defendant SANG BAE CHUNG, d/b/a DE NICE WEAR, INC. (Docs. 1 and 3). On November 25, 2020, law enforcement arrested defendant CHUNG in the Northern District of Georgia. Per the policy of the Northern District of Georgia, in order to ensure that defendant CHUNG is able to obtain a copy of his complaint and arrest warrant at his initial appearance in the Northern District of Georgia, the United States requests that this Court unseal the Complaint and Warrant as to him only.

Dated: November 25, 2020.

DREW H. WRIGLEY  
United States Attorney

By: /s/ Jonathan J. O'Konek  
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